

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Cr. No. 19-1631-DHU
	)	
vs.	)	
	)	
KAMAL BHULA, et al.,	)	
	)	
	)	
Defendant.	)	

**UNITED STATES' UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE RESPONSE TO DEFENDANT KAMAL BHULA'S OBJECTIONS  
TO THE PRESENTENCE INVESTIGATION REPORT**

COMES NOW the United States and hereby respectfully requests the Court to issue an order to extend the date in which to respond to Defendant Kamal Bhula's Objections to the Presentence Investigation Report filed on October 6, 2023 (Doc. 599) (hereinafter referred to as "Objections to the PSR"). In support of this motion, the United States submits the following:

1. On October 6, 2023, defendant filed his Objections to the PSR. Doc. 599. The United States' Response to Defendant's Objections to the PSR are due on or before October 13, 2023.
2. The defendant raises approximately 34 objections to the PSR, and also briefs a request for mitigating role. One week's time will be insufficient to fully respond to this number of objections. As such, the United States respectfully requests seven additional days from October 13, 2023, or until October 20, 2023, to respond to Defendant's Objections to PSR.
3. Defendant's Sentencing Hearing has not yet been scheduled in this matter.
4. Counsel for Defendant, Nicole W. Moss, does not oppose this request.

WHEREFORE, the United States respectfully requests an extension of time until October 20, 2023, for the United States to respond to Defendant's Objections to the PSR.

Respectfully submitted,

ALEXANDER M.M. UBALLEZ  
United States Attorney

Electronically filed 10/11/2023  
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I HEREBY CERTIFY that on the 11<sup>th</sup>  
day of October 2023 I filed the foregoing  
pleading electronically through the CM/ECF  
system, which caused counsel of record  
to be served by electronic means on this date.

/s/\_\_\_\_\_  
LETITIA C. SIMMS  
Assistant U.S. Attorney